

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

OAXACO EL BEY,)	
)	
Plaintiff,)	
)	
v.)	
)	
RECEIVABLES PERFORMANCE)	Case No.: 4:14-cv-820
MANAGEMENT, LLC,)	
)	
Defendant.)	
)	

**JOINT REPORT OF RULE 26 PLANNING MEETING AND PROPOSED DISCOVERY
SCHEDULE**

Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 16.1, a meeting was held on November 24, 2014 between Plaintiff, Oaxaco El Bey, and Counsel for the Defendant, Angelo J. Kappas, and an agreement was reached on the following proposed dates:

Pre-Discovery

1. The parties to exchange Rule 26(a) disclosures on or before December 8, 2014;
2. Any motion to join additional parties shall be filed on or before January 30, 2015;
3. Any motion to amend the pleadings shall be filed on or before January 30, 2015;

Discovery Plan

1. Discovery will be needed on the following subjects: The allegations of Plaintiff's Complaint and whether a permissible purpose existed;
2. All discovery will be commenced in time to be completed by June 30, 2015;
3. A maximum of twenty-five (25) interrogatories and twenty-five (25) requests for production of documents by each party to any other party shall be allowed;

4. A maximum of twenty-five (25) requests for admission by each party to any other party shall be allowed;
5. A maximum of five (5) depositions by each party shall be allowed. Each deposition shall be limited to a maximum of seven (7) hours for all witnesses unless extended by agreement of the parties;
6. Plaintiff no later than April 15, 2015 will provide Defendant with the disclosures required under Rule 26(a)(2) pertaining to expert witnesses. Defendant will provide Rule 26(a)(2) expert disclosures to Plaintiff no later than May 28, 2015;
7. The parties discussed Electronically Stored Information (ESI) issues and do not anticipate any ESI matters arising in this litigation. Standard CD-ROM and documents will be facilitated in exchanging ESI.
8. All discovery motions shall be filed on or before June 30, 2015;
9. All potentially dispositive motions shall be filed on or before July 30, 2015;
10. The parties anticipate that this case will take approximately two (2) days to try and will be ready for trial to a jury in September 2015.

Dated: December 8, 2014

Respectfully submitted,

By: /s/ Oaxaco El Bey
Plaintiff
2020 Cleveland Ave.
Kansas City, MO 64127

By: /s/ Angelo J. Kappas
Angelo J. Kappas
GORDON & REES LLP
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Chicago, IL 60606
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Attorney for Defendant
Receivables Performance Management, LLC

CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2014, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all attorneys of record, and sent a copy of the foregoing document via regular mail, postage prepaid, addressed to the following non CM/ECF participants:

*Plaintiff Oaxaco El Bey
2020 Cleveland Ave.
Kansas City, MO 64127*

Respectfully submitted,

By: /s/ Angelo J. Kappas
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